From: Neinast, William A. To: Lawrence Flynn

7:23-cv-01427-TMC

Kolb, Karen; Ginny Bozeman; Speer, R. Taylor Cc: Bcc: {F22756410}.Active@wcs.foxrothschild.com

Subject: RE: Blockquarry v. BPW and Litchain | 7:23-cv-01427-TMC

Date: April 12, 2023 5:42:32 PM

Attachments: EXT Activity in Case 723-cv-01427-TMC Blockquarry Corp v. Litchain Corp et al Order on Motion for TRO.msg

Hi Lawrence,

Please find attached and hereby served a Text Order from the Court related to Blockquarry's Motion for a Temporary Restraining Order and Preliminary Injunction. Please note the Court's admonishment against the dissipation and/or waste of the property at issue in this case. In light of this Text Order and Blockquarry's concern over the possible dissipation of the deposit funds, as discussed in its prior pleadings, we would ask that you please confirm that BPW has no plans to dissipate the deposit funds or cause any waste to the personal property on the premises until after pertinent adjudication. Taylor and I would be glad to discuss this with you; please give either of us a call at your earliest convenience.

Best.

Will

William A. Neinast | Fox Rothschild LLP

2 W. Washington St., Suite 1100 Greenville, SC 29601-2784 (864) 751-7600 | vCard

WNeinast@foxrothschild.com | www.foxrothschild.com

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From: Lawrence Flynn lflynn@popeflynn.com>

Sent: April 11, 2023 10:20 AM

To: Speer, R. Taylor <TSpeer@foxrothschild.com>

Cc: Neinast, William A. <WNeinast@foxrothschild.com>; Kolb, Karen <KKolb@foxrothschild.com>;

Ginny Bozeman <gbozeman@popeflynn.com>

Subject: [EXT] Re: Blockquarry v. BPW and Litchain | 7:23-cv-01427-TMC

I'm out of the office this week, but we agree to accept service electronically. Thanks.

Lawrence Flynn Pope Flynn, LLC lflynn@popeflynn.com **From:** Speer, R. Taylor < TSpeer@foxrothschild.com>

Sent: Tuesday, April 11, 2023 10:00:13 AM **To:** Lawrence Flynn < lflynn@popeflynn.com>

Cc: Neinast, William A. wNeinast@foxrothschild.com; Kolb, Karen KKolb@foxrothschild.com;

Subject: RE: Blockquarry v. BPW and Litchain | 7:23-cv-01427-TMC

Lawrence, attached is an emergency motion for TRO relative to the deposit and personal property belonging to Blockquarry and its clients. The motion, pleading, and summons will be personally served upon BPW today. Best,



R. Taylor Speer Counse Greenv e, SC (864) 751-7665 * 827 7665

From: Speer, R. Taylor Sent: April 10, 2023 2:46 PM

To: Lawrence Flynn < lflynn@popeflynn.com>

Cc: Neinast, William A. < <u>WNeinast@foxrothschild.com</u>>

Subject: Blockquarry v. BPW and Litchain | 7:23-cv-01427-TMC

Lawrence, attached is a stamped copy of the complaint, along with a summons issued as to BPW. Please comment on whether BPW will waive service. Best,



R. Taylor Speer Counse

Greenv e, SC (864) 751-7665 * 827 7665

From: Speer, R. Taylor < TSpeer@foxrothschild.com>

Sent: April 7, 2023 5:48 PM

To: Lawrence Flynn < lflynn@popeflynn.com>

Cc: Neinast, William A. < <u>WNeinast@foxrothschild.com</u>> **Subject:** Blockquarry v. BPW and Litchain | case pending

Lawrence, attached is a copy of filings made with the district court this afternoon. Confirmation of the filing is enclosed, but I do not have a case number. We anticipate filing a motion for TRO on Monday. Pursuant to Rule 4(d), please respond with comment on whether BPW will waive service. Best.

> R. Taylor Speer Counse



Greenv e, SC (864) 751-7665 *827 7665

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